Dec 2, 2014

To Derek Rockett,

I attended the meeting in South Bend on Dec 2 regarding the use of imidacloprid to control burrowing shrimp in Willapa Bay. I would like to have my comments placed on record.

The use of any toxic chemical in the cleanest estuary in the lower 48 states is problematic at best. The use of an untested (for long term aquatic use) pesticide borders on irresponsible. There are no long term studies of imidacloprid in an aquatic environment.

The breakdown products have not been studied in detail. By your own admission one of the breakdown products of concern wasn't studied because there wasn't a standard available. That alone should be enough to at least delay issuance.

The interactions of imidacloprid and its breakdown products with other chemicals in the environment haven't been studied in depth.

There is research that the application rate allowed by EPA is minimally effective at best so why allow an untested ineffective pesticide to be used at all.

Imidacloprid is banned in the EU *due to its effects on the honey bee. While honey bees and other bees do not pollinate oysters they are often found flying long distances from land over water and could be exposed to imidacloprid during application. Even a sub lethal dose leaves them more susceptible to other pathogens. Imidacloprid is also more toxic to bees by oral ingestion which would make it more of a risk than just being exposed to the spray.

The growers cite economic and cultural reasons for the use of imidacloprid on the oyster beds, which is true. However, the effect of the loss of pollinators has much greater cultural, economic and ecological consequences than the loss of oyster revenue.

There are alternatives to the use of pesticides in oyster cultivation such as stake culture. These may not be as profitable but have a much lower impact and don't require the use of toxins in the bay. Also allowing the bay to cleanse itself of toxins may bring back species that consume the shrimp and solve the problem.

Thank you for considering my comments.
Sincerely,
Brent Naylor
129 Monohon Landing Rd
Raymond, WA 98577

*" In January 2013, the European Food Safety Authority stated that neonicotinoids pose an unacceptably high risk to bees, and that the industry-sponsored science upon which regulatory agencies' claims of safety have relied might be flawed, concluding that, "A high acute risk to honey bees was identified from exposure via dust drift for the seed treatment uses in maize, oilseed rape and cereals. A high acute risk was also identified from exposure via residues in nectar and/or pollen."[111] An author of a *Science* study prompting the EESA review suggested that industry science pertaining to neonicotinoids may have been deliberately deceptive, and the UK Parliament has asked the manufacturer Bayer Crop Science to explain discrepancies in evidence they have submitted to an investigation."[1] European Food Safety Authority (16 January 2013) "Conclusion on the peer review of the pesticide risk assessment for bees for the active substance clothianidin" *EFSA Journal* **11**(1):3066.